



# **Air Quality Permitting Statement of Basis**

**November 2, 2007**

**Tier I Operating Permit No. T1-040122**

**Dynamic Fabricators, LLC  
Rathdrum, ID**

**Facility ID No. 055-00035**

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**DRAFT FOR PUBLIC COMMENT**

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## **Acronyms, Units, and Chemical Nomenclature**

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
Dynamic	Dynamic Fabricators, LLC
EPA	U.S. Environmental Protection Agency
FRP	Fiberglass Reinforced Plastic
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	oxides of nitrogen
NSPS	New Source Performance Standards
O <sub>3</sub>	ozone
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	Potential to Emit
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

## **1. PURPOSE**

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362.

The Department of Environmental Quality (DEQ) has reviewed the information provided by Dynamic Fabricators, LLC regarding the operation of its facility located in Rathdrum. This information was submitted based on the requirements to submit a Tier I operating permit application in accordance with IDAPA 58.01.01.312.

## **2. FACILITY DESCRIPTION**

Dynamic Fabricators, LLC (Dynamic) manufactures fiberglass reinforced plastic (FRP) parts using open molding and closed molding (e.g. infusion and resins transfer molding) techniques. Products manufactured on site include cooling tower components (e.g. framework, fan stacks, pipe, etc.), docks, corrosive-resistant pipe, and custom manufacturing.

The fiberglass building contains two separate operations – fiberglass shop and FRP fabrication. The fiberglass shop, at the north end of the fiberglass building, is sectioned into following areas: laminating pipe winding, pump/compressor storage, detail, and curing. Raw materials used in the production of the FRP product include gel coat, polyester resins containing styrene, fiberglass roving, and catalyst (methyl ethyl ketone peroxide). Resins, gel coat, and solvent are stored in secondary containment. Catalyst is segregated per fire code from the flammable materials and stored in an underground bunker to the north of the fiberglass building. Air from this process is exhausted through two identical stacks, identified as Stack No. 1 and Stack No. 2.

Dynamic is subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP): Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWW.

## **3. FACILITY/AREA CLASSIFICATION**

This facility is a major facility as defined by IDAPA 58.01.01.008.10, because it emits or has the potential to emit a regulated air pollutant(s) in amounts greater than or equal to major facility threshold(s) listed in Subsection 008.10 of the Rules. Refer to Section 6.2 of this document for a complete emissions inventory of the air pollutants emitted by this facility.

This facility is not a designated facility as defined by IDAPA 58.01.01.006.30.

This facility is not a major facility as defined by IDAPA 58.01.01.205, because it does not emit or have the potential to emit a regulated criteria air pollutant in amounts greater than or equal to 250 tons per year.

The Standard Industrial Classification (SIC) defining the facility is 3089, and the Aerometric Information Retrieval System (AIRS) facility classification is A.

The facility is located in Rathdrum, which is classified as unclassifiable for all criteria pollutants. There is not a Class I area(s) within 10 kilometers (km) of the facility. This facility is located in Air Quality Control Region (AQCR) 62 and Universal Transverse Mercator (UTM) Zone 11.

## 4. APPLICATION SCOPE

- This permitting action is for the renewal of the Tier I operating permit for the facility. This Tier I operating permit incorporates PTC No. P-030141, issued February 7, 2005.
- This Tier I operating permit incorporates National Emissions Standards for Hazardous Air Pollutants (NESHAP): Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW that applies to the facility.

## 5. SUMMARY OF EVENTS

October 5, 2004	DEQ received application. Application was determined complete by default
February 7, 2005	Modified Permit to Construct (PTC) was issued to Dynamic
May 15, 2007	DEQ and Dynamic conducted a conference call
June 8, 2007	DEQ staff visited Dynamic to review process
July 20, 2007	Additional information was received from Dynamic addressing the MACT (40 CFR 63, Subpart WWWW) that applies to the facility.
October 2, 2007	Additional information was received from Dynamic addressing the CAM and the insignificant activities.
October 30, 2007	DEQ received comments on the facility draft permit.

## 6. PERMIT ANALYSIS

### 6.1 *Basis of Analysis*

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- Tier I Operating Permit No. T1-010922, issued November 8, 2002.
- Tier I Operating Permit application received on October 5, 2004.
- PTC No. P-030141, issued February 7, 2005.
- MACT information applicable to Dynamic received on July 20, 2007.
- Guidance developed by the U.S. Environmental Protection Agency (EPA) and DEQ.

### 6.2 *Emissions Description and Emissions Inventory*

A detailed emissions inventory for PM<sub>10</sub>, styrene, and VOC were provided in the statement of basis for the PTC No. P-030141, issued February 7, 2005. Table 6.1 below represents the uncontrolled and permitted emissions for the styrene and non-styrene volatile organic compounds (VOC) from stacks nos. 1 and 2. The PM<sub>10</sub> emissions in the table represent the controlled and permitted emissions. For more information about these emissions, please refer to the statement of basis for PTC No. P-030141, issued February 7, 2005.

**Table 6.1 PM<sub>10</sub>, Styrene, and non-Styrene VOC emissions<sup>a</sup> from stacks nos. 1 and 2**

Source Description	PM <sub>10</sub>		Styrene		VOC (non-Styrene) <sup>b</sup>	
	Lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Manufacturing FRP stacks nos. 1 and 2	2.27	9.92	43.4	54.4	5.66	24.86

<sup>a</sup> The pounds per hour emissions as determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or by DEQ's emissions estimation methods used in the permit application analysis. The annual emissions as determined by multiplying the actual or allowable (if actual is not available) pounds per hour emissions rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

<sup>b</sup> Volatile organic compounds (i.e., alpha methyl styrene, methyl methacrylate, vinyl acetate, hexylene glycol, and methyl ethyl ketone)

## **7. REGULATORY ANALYSIS**

### **7.1 IDAPA 58.01.01.369 –Tier I Operating Permit Renewal**

This permitting action is for the renewal of the facility's Tier I operating permit. The renewed permit incorporates the MACT standards of 40 CFR 63, Subpart WWWW that applies to the facility and it also includes the modified PTC No. No. P-030141, issued February 7, 2005.

### **7.2 New Source Performance Standards (NSPS) – 40 CFR 60**

Dynamic is not subject to NSPS.

### **7.3 National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production - 40 CFR 63, Subpart WWWW**

This subpart establishes NESHAP for reinforced plastic composites production. This subpart also establishes compliance options, operating requirements, and work practice requirements to demonstrate initial and continuous compliance with the hazardous air pollutants (HAP) emissions standards for open molding, polymer casting, mixing, and cleaning of equipment procedures used in reinforced plastic composites manufacture. The requirements of this subpart apply to this facility, because the facility-wide HAP emissions of the facility exceed major source thresholds.

### **7.4 Compliance Assurance Monitoring - 40 CFR 64**

The 40 CFR 64.2, states the following: "..., *the requirements of this subpart shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria: (1) the unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), or other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section; (2) the unit uses a control device to achieve compliance with any such emission limitation or standard; (3) the unit has a potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, potential pre-control device emissions shall have the same meaning as potential to emit, as defined in 40 CFR 64.1, except that emission reductions achieved by the applicable control device shall not be taken into account*"

Dynamic submitted a CAM applicability to DEQ on October 2, 2007. In the submittal, the company reported a PM<sub>10</sub> uncontrolled potential to emit from the FRP Products process that equals to 62 T/yr. Based on this submittal the PM<sub>10</sub> emissions from this process is less than the major source threshold of 100 T/yr; and therefore the compliance assurance monitoring (CAM) is not applicable to the facility.

Emissions of styrene from the FRP products process are uncontrolled and therefore not subject to CAM.

## **8. PERMIT CONDITIONS**

This section describes those permit conditions, established through the issuance of a PTC, that have changed during this Tier I operating permit cycle.

The existing permit conditions were established by PTC No. 055-00035, issued August 25, 1994. The revised permit conditions were established in PTC No. P-030141, issued February 7, 2005.

### ***Manufacturing FRP Products***

#### **8.1 Emission Unit Description**

The Emission unit is described in Section 2 of this statement of basis.

#### **8.2 Existing Permit Condition 2.1**

Existing Permit Condition 2.1 limits the combined PM and PM<sub>10</sub> emissions from stacks nos. 1 and 2 to 2.19 lb/hr and 5.68 T/yr, respectively.

#### **8.3 Revised Permit Condition 3.1**

Revised Permit Condition 3.1 limits the combined PM and PM<sub>10</sub> emissions from stacks nos. 1 and 2 to 2.27 lb/hr and 9.92 T/yr, respectively. The change is a result of issuance of a PTC modification on February 7, 2005.

#### **8.4 Existing Permit Condition 2.2**

Existing Permit Condition 2.2 requires the permittee to conduct a performance test to measure PM from either stack No. 1 or stack No. 2 if visible emissions exceed 20% opacity, as required in PTC No. 055-00035, issued on 8/25/94. This permit condition is deleted in the revised permit because PTC No. 055-00035 was replaced by a modified PTC No. P-030141, issued February 7, 2005, which did not contain a PM performance test requirement if visible emissions exceeds 20% opacity.

#### **8.5 Existing Permit Condition 2.5**

Existing Permit Condition 2.5 sets a throughput limit of fiberglass not to exceed 400,000 pounds per any consecutive 12-month period.

#### **8.6 Revised Permit Condition 3.5**

Revised Permit Condition 3.5 sets a throughput limit of fiberglass not to exceed 800,000 pounds per any consecutive 12-month period (400 T/yr). The change is a result of issuance of a PTC modification on February 7, 2005.

## **8.7 Existing Permit Condition 2.8**

Existing Permit Condition 2.8 requires the permittee to conduct, at least once during the permit term, a performance test to measure PM and PM<sub>10</sub> emissions from the facility's stacks nos. 1 and 2. This permit condition is removed from the revised permit because the permittee has already conducted a PM<sub>10</sub> source test on December 28-29, 2004, as required in the Tier I operating permit. This permit condition was included in the Tier I operating permit as a gap filling to demonstrate compliance with PM emissions limits existed in PTC No. 055-00035, issued August 25, 1994. However, PTC No. 055-00035 was replaced by PTC No. P-030141, issued February 7, 2005, which contained a PM<sub>10</sub> testing requirements. And since this requirement has been fulfilled, DEQ concluded that it is not necessary to include this permit condition in the revised permit.

## **8.8 Existing Permit Condition 2.9**

Existing Permit Condition 2.9 sets a VOC (other than styrene) emissions limit from stacks nos. 1 and 2 combined not to exceed 1.69 T/yr. This permit condition is deleted in the revised permit because PTC No. 055-00035, issued on August 25, 1994 was replaced by a modified PTC No. P-030141, issued February 7, 2005, which did not contain a VOC emissions limit.

## **8.9 Existing Permit Condition 2.10**

Existing Permit Condition 2.10 requires the permittee to monitor on a monthly basis the amount of non-styrene VOC's which were emitted. This permit condition is deleted in the revised permit. Modified PTC No. P-030141, issued February 7, 2005 did not contain any monitoring requirements for non-styrene VOC emissions.

## **8.10 Existing Permit Conditions 2.11 and 2.12**

Existing Permit Condition 2.11 sets 600 pounds of acetone usage per month at the facility. This permit condition is deleted in the revised permit. Modified PTC No. P-030141, issued February 7, 2005 did not require any acetone usage limits at the facility. Existing Permit Condition 2.12 sets monthly monitoring and recording requirements for acetone used at the facility. This permit condition is deleted in the revised permit as a result of deleting Permit Condition 2.11.

## **8.11 Existing Permit Conditions 2.13**

Existing Permit Condition 2.13 limits the combined styrene emissions from stacks nos. 1 and 2 to 18.1 lb/hr.

## **8.12 Revised Permit Condition 3.2**

Revised Permit Condition 3.2 limits the combined styrene emissions from stacks nos. 1 and 2 to 43.4 lb/hr. The change is a result of issuance of a PTC modification on February 7, 2005.

## **8.13 Existing Permit Condition 2.21**

Existing Permit Condition 2.21 limits the maximum amount of resins, gel coat, and catalyst used at the facility to 360, 51.5, and 8.5 tons per year, respectively.

## **8.14 Revised Permit Condition 3.5**

Revised Permit Condition 3.5 limits the maximum throughput of resins, gel coat, and catalyst used at the facility to 720, 103, and 17.5 tons per year, respectively. The change is a result of issuance of a PTC modification on February 7, 2005.



### **8.15 Permit Conditions 3.13**

Permit Condition 3.13 establishes the applicable compliance deadline, emission limitations, operating limitations and work practice standard of 40 CFR 63, Subpart WWWW.

### **8.16 Permit Conditions 3.14**

Permit Conditions 3.14 establishes the compliance demonstration requirements of 40 CFR 63, Subpart WWWW that assure compliance with Permit Condition 3.13. Specifically, Permit Condition 3.14 establishes the options for meeting the standards, established by Permit Condition 3.13, for open molding and centrifugal casting operations at new and existing sources. Permit Condition 3.14 also establishes the general compliance, continuous compliance demonstration, and performance test or other initial compliance demonstration requirements necessary to demonstrate compliance with Permit Condition 3.13. Additionally, Permit Condition 3.14 establishes the recordkeeping requirements for demonstrating compliance with Permit Condition 3.13.

### **8.17 Permit Conditions 3.15**

Permit Condition 3.15 contains reporting requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW necessary to demonstrate compliance with Permit Condition 3.13.

Dynamic submitted the initial compliance report, as required in 40 CFR 63.5910 and the initial notification, as required in 40 CFR 63.5905 to DEQ on March 19, 2007.

The Coeur d'Alene Regional Office requested clarification for Permit Conditions 3.10 (Styrene Monomer Content) and 3.12 (Work Practices).

#### **3.10 Styrene Monomer Content**

- The permittee shall use polyester resins with a styrene monomer content of no more than 35% by weight. This provision shall not apply to the use of gel coat and resin used for mold construction, corrosion-resistant resin, and fire retardant resins.
- Excluding the gel coat and specialty resins, 90% by weight of all polyester resins used by the permittee shall have a styrene monomer content of no more than 35% by weight.

This permit condition is unchanged. The intent of this permit condition is to limit the use of gel coat and specialty resins (specialty resins are defined as resins for mold construction, corrosion-resistant resin, and fire retardant resins) to 10% of the total polyester resins used at the facility annually.

#### **3.12 Work Practices**

- The permittee shall at all times keep all exterior doors and/or windows of the building, used for fiberglass operations, tightly closed except for the explicit purpose of moving necessary equipment, materials, or personnel into or out of the building.
- Airless spray guns shall be used for all spray-up processes including gel coat application.

This permit condition is unchanged. The intent of this permit condition is to limit the particulate emissions that do not pass through the filter media to stack 1 and stack 2. Exterior doors on the building that the fiberglassing operations occur lead directly to lay out areas and not spray-up areas. Fiberglassing operations occur behind interior doors that remain tightly closed at all time except when moving necessary equipment, materials, or personnel into or out of the fiberglassing room to ensure particulate matter emissions are controlled.

The permittee shall use only airless spray gun for all spray up processes including gel coat application.

If Dynamic wishes to use a high velocity low pressure (HVLP) spray gun, the permittee is strongly encouraged to revise the PTC.

**The following are discussions on the sections in the 40 CFR 63, Subpart WWWW that apply or may not apply to this facility:**

40 CFR 63, Subpart WWWW.....National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production

This subpart establishes national emissions standards for hazardous air pollutants (NESHAP) for reinforced plastic composites production. This subpart also establishes compliance options, operating requirements, and work practice requirements to demonstrate initial and continuous compliance with the hazardous air pollutants (HAP) emissions standards for open molding, polymer casting, mixing, and cleaning of equipment procedures used in reinforced plastic composites manufacture. The requirements of this subpart apply to this facility because the facility-wide HAP emissions of the facility exceed major source thresholds.

40 CFR 63.5785(a).....Am I subject to this subpart?

The requirements of this subpart apply to this facility because the facility owns or operates a reinforced plastic composites production facility that is located at a major source of HAP emissions.

40 CFR 63.5787 .....What if I also manufacture fiberglass boats or boat parts?

40 CFR 63.5787(a) applies because the source meets the applicability criteria in 40 CFR 63.5785, and is not subject to the Boat Manufacturing NESHAP (40 CFR part 63, subpart VVVV). The requirements of 40 CFR 63.5785(b) through (d) do not apply because the facility is not subject to the Boat Manufacturing NESHAP (40 CFR part 63, subpart VVVV).

40 CFR 63.5790 .....What parts of my plant does this subpart cover?

In accordance with 40 CFR 63.5790(a), the facility is subject to this subpart because it is a new or existing facility. In accordance with 40 CFR 63.5790(b), the affected sources located at the facility are open molding, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts the facility manufactures.

40 CFR 63.5795 .....How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?

In accordance with 40 CFR 63.5795(a), a reinforced plastic composites production facility is a new affected source if it meets all the criteria in paragraph (a)(1) and (2) of this section.

(1) You commence construction of the source after August 2, 2001; (2) you commence construction, and no other reinforced plastic composites production source exists at that site.

Dynamic is an existing affected source because it commenced construction before August 2, 2001. For the purposes of this subpart, an existing affected source is any affected source that is not a new affected source.

40 CFR 63.5796 .....What are the organic HAP emissions factor equations in Table 1 to this subpart, and how are they used in this subpart?

You may use the equations in Table 1 to this subpart to calculate your emissions factors. Equations are available for each open molding operation and centrifugal casting operation and have units of pounds of organic HAP emitted per ton (lb/ton) of resin or gel coat applied. These equations are intended to provide a method for you to demonstrate compliance without the need to conduct for a HAP emissions test. In lieu of these equations, you can elect to use site-specific organic HAP emissions factors to

demonstrate compliance provided your site-specific organic HAP emissions factors are incorporated in the facility's air emissions permit and are based on actual facility HAP emissions test data. You may also use the organic HAP emissions factors calculated using the equations in Table 1 to this subpart, combined with resin and gel coat use data, to calculate your organic HAP emissions.

40 CFR 63.5797 .....How do I determine the organic HAP content of my resins and gel coats?

In accordance with 40 CFR 63.5797, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in 40 CFR 63.5797(a) through (c).

40 CFR 63.5798 .....What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?

This section does not apply to Dynamic.

40 CFR 63.5799 .....How do I calculate my facility's organic HAP emissions on a T/yr basis for purposes of determining which paragraphs of 40 CFR 63.5805 apply?

In accordance with 40 CFR 63.5799, the facility is an existing facility, and must use the procedures in either paragraph (b)(1) or (2) of this section to calculate the facility's organic HAP emissions in T/yr for purposes of determining which paragraphs in § 63.5805 apply to the facility. The permittee must also comply with the calculation and notification requirements of 40 CFR 63.5799(c).

40 CFR 63.5800 .....When do I have to comply with this subpart?

In accordance with 40 CFR 63.5800, the permittee must comply with the standards in this subpart by the dates specified in Table 2 to this subpart. For an existing source, the date specified in Table 2 is April 21, 2006. The permittee has organic HAP emissions standard based on a 12-month rolling average, and, therefore, must begin collecting data on the compliance date in order to demonstrate compliance.

40 CFR 63.5805 .....What standards must I meet to comply with this?

40 CFR 63.5805(a), (a)(1), and (a)(2) of (a) do not apply to the facility because it does not have any centrifugal casting or continuous casting/lamination operations. 40 CFR 63.5805(b) applies because the facility is an existing facility and must meet the organic HAP emissions limits in Table 3 to this subpart and the work practice in Table 4 to this subpart, regardless of the quantity of HAP emitted. 40 CFR 63.5805(c) does not apply because Dynamic is not a new facility.

40 CFR 63.5805(d)(1) and (2) and 40 CFR 63.5805(c) don't apply to the facility because Dynamic is not a new facility.

The facility is subject to 40 CFR 63.3805(g), which requires repair operations subject to this subpart as defined in 40 CFR 63.5785 to meet the requirements in Tables 3 and 4 to this subpart and are not required to meet the 95 percent organic HAP emissions reduction requirements in paragraph (a)(1) or (d) of 40 CFR 63.5805.

All work practices in Tables 4 apply except 1, 4, 5, and 9. The following operations occur at Dynamic which have emission limits in Tables 3:

- open molding non-CR/HS operations that use manual resin application,
- open molding tooling operations that use manual resin application
- open molding low flame spread/low-smoke product operations that use manual resin application
- open molding shrinkage controlled resins operations that use manual resin application
- open mold gel coat operations that use tooling gel coating
- open mold gel coat operations that use white/off white pigmented gel coating
- open mold gel coat operations that use all other pigmented gel coating

40 CFR 63.5810 .....What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?

The facility must use one of the methods in 40 CFR 63.5810 paragraphs (a) through (d) to meet the standards for open molding in Table 3 of this subpart.

40 CFR 63.5820 .....What are my options for meeting the standards for continuous lamination/casting operations?

Paragraphs (a) through (d) of this section do not apply to the facility because the facility has open molding operations, and is not subject to the standards continuous lamination/casting operations.

40 CFR 63.5830 .....What are my options for meeting the standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reductions requirement?

40 CFR 63.5830 and paragraphs (a) through (d) of the section do not apply to the facility because the facility has open molding operations, and is not subject to the standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reductions requirement.

40 CFR 63.5835 .....What are my general requirements for complying with this subpart?

Paragraph (a) of this section applies to the facility and requires the facility to be in compliance at all times with the work practice standards in Table 4 and the organic HAP emissions limits in Table 3.

Paragraph (b) of this section does not apply because the facility does not use add-on controls.

Paragraphs (c) and (d) of 40 CFR 63.5835 generally apply to all facilities subject to 40 CFR 63, Subpart WWW.

40 CFR 63.5840 .....By what date must I conduct a performance test or other initial compliance demonstration?

The facility must comply with the data collection and compliance demonstration requirements of this paragraph by the compliance date specified by 40 CFR 63.5800. Because the facility is an open molding operation that elected to meet an organic HAP emissions limit on a 12-month rolling average, the facility must initiate collection of the required data on the compliance date, and demonstrate compliance one year after the compliance date.

40 CFR 63.5845 .....When must I conduct subsequent performance tests?

This section does not apply to Dynamic because it does not operate an add-on control device to meet a standard.

40 CFR 63.5850 .....How do I conduct performance tests, performance evaluations, and design evaluations?

This section does not apply to the permittee because these requirements apply to facilities that operate an add-on control device to meet a standard.

40 CFR 63.5855 .....What are my monitor installation and operation requirements?

This section does not apply to Dynamic because these requirements apply to facilities that operate an add-on control device to meet a standard.

40 CFR 63.5860 .....How do I demonstrate initial compliance with the standards?

Paragraph (a) of this section applies to the facility and requires the facility demonstrate initial compliance with each applicable organic HAP emissions standard in 40 CFR 63.5805 paragraphs (a) through (h) by using the procedures shown in Tables 8 and 9 of this subpart. Specifically, only item 1 of Table 8 applies, and items 2, 3, and 8 of Table 9 apply. Paragraph (b) of this section does not apply to the permittee because these requirements apply to facilities that operate an add-on control device to meet a standard.

40 CFR 63.5865-5890.....What data must I generate to demonstrate compliance with the standards for continuous lamination/casting operations?

This section does not apply to Dynamic because these requirements apply to facilities that have continuous lamination/casting operations. The facility has open molding operations.

40 CFR 63.5895 .....How do I monitor and collect data to demonstrate continuous compliance?

Section (a) of 40 CFR 63.5895 does not apply to the permittee because this requirement applies to facilities that operate an add-on control device to meet a standard. Sections (b)(1) through (b)(4), (c) and (d) of 40 CFR 63.5895 apply to the facility. Section (e) of 40 CFR 63.5895 does not apply to the permittee because this requirement applies to facilities that operate pultrusion machines.

40 CFR 63.5900 .....How do I demonstrate continuous compliance with the standards?

Paragraph (a)(1) and (d) of this section do not apply to Dynamic because these requirements apply to facilities that operate an add-on control device to meet a standard. Sections (a)(2) through (a)(4), (b), (c) and (e) of 40 CFR 63.5900 apply.

40 CFR 63.5905 .....What notifications must I submit and when?

Sections (a) and (b) of 40 CFR 63.5905 apply. The permittee must submit all of the notifications in Table 13 that apply to the facility by the date specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR part 63, Subpart A, referenced in Table 15 to this subpart. If the permittee change any information submitted in any notification, the permittee must submit the changes in writing to the administrator within 15 calendar days after the change. Dynamic submitted a notifications to DEQ on July 23, 2007.

40 CFR 63.5910 .....What reports must I submit and when?

Paragraphs (a), (b), (b)(1) through (b)(5), (c), (c)(1) through (c)(5), (h), (i) and (g) of this section apply. Paragraphs (c)(6), (e), and (e)(1) through (e)(12) do not apply because Dynamic does not operate a continuous monitoring system. Paragraph (f) does not apply because the facility is not subject to 40 CFR 63.5805(a)(1) or (d). Section (g) of 40 CFR 63.5910 applies to Dynamic because the facility has a Title V operating permit pursuant to 40 CFR part 70. The initial compliance report was submitted to DEQ on July 23, 2007.

40 CFR 63.5915 .....What records must I keep?

Paragraphs (a), (a)(1) through (3), (c), and (d) of this section apply. Paragraphs (b) of this section does not apply to Dynamic because this requirement applies to facilities that operate an add-on control device, which the permittee does not. Paragraphs (e)(1) through (4) of this section do not apply because the facility does not have new or existing continuous lamination/casting operations.

40 CFR 63.5920 .....In what form and how long must I keep my records?

Paragraphs (a) through (d) of this section apply.

40 CFR 63.5925 .....What parts of the General Provisions apply to me?

This section and Table 15 of Subpart WWWW, applies to this facility as specified.

40 CFR 63.5930 .....Who implements and enforces this subpart?

This section does not apply to the facility. This subpart can be administered by EPA or a delegated authority such as DEQ.

40 CFR 63.5935 .....What definitions apply to this subpart?

The definitions of this section apply to the facility.

## 9. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in Table 9.1 below to qualify for a permit shield.

**Table 9.1 INSIGNIFICANT ACTIVITIES**

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
Associated with FRP production -6000-gallon resin tank	(3), [3/23/98]
Fiberglass building, woodshop, purchasing/storeroom, grinding room, and administration building –natural gas space heaters – less than 5 MMBtu/hr	(18), [3/3/95]
Propane storage tank	(4), [3/3/95]
Fiberglass building – 4.4 MMBtu/hr	(18), [5/3/03]
PVC pipe and manifold gluing operations	(30), [5/3/03]
Mold preparation and mold release application operations	(30), [5/3/03]
Wood shop activities where air is returned to building	(30), [5/3/03]

## 10. ALTERNATIVE OPERATING SCENARIOS

The facility did not request any alternative operating scenarios.

## 11. TRADING SCENARIOS

The facility did not request any trading scenarios.

## **12. COMPLIANCE SCHEDULE**

### **12.1 Compliance Plan**

No compliance plan has been developed.

### **12.2 Compliance Certification**

Dynamic is required to periodically certify compliance in accordance with General Provision 21. The facility shall submit an annual compliance certification for each emissions unit to DEQ and EPA, in accordance with IDAPA 58.01.01.322.11. The compliance certification report shall address the compliance status of each emissions unit with the terms and conditions of this permit.

## **13. PERMIT REVIEW**

### **13.1 Regional Review of Draft Permit**

The draft permit and the statement of basis were provided to DEQ's Coeur d'Alene Regional Office on September 26, 2007.

### **13.2 Public Comment**

DEQ shall provide a draft permit for public comment in accordance with IDAPA 58.01.01.364. The states of Washington and Montana and the Coeur d'Alene Tribe are within 50 miles of this Tier I Source and are affected states. As such, notification of the public comment period will be provided as required by IDAPA 58.01.01.364.

## **14. ACID RAIN PERMIT**

This facility is not an affected facility as defined in 40 CFR 72 through 75; therefore, acid rain permit requirements do not apply.

## **15. REGISTRATION FEES**

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply. The facility is in compliance with registration and registration fee requirements.

## **16. RECOMMENDATION**

Based on the Tier I operating permit application and review of state rules and federal regulation, staff recommends that DEQ issue facility draft Tier I Operating Permit No. T1-040122 to Dynamic Fabricators, LLC for its manufacturing FRP products facility in Rathdrum, Idaho. The permit shall be made available for public comment as required by IDAPA 58.01.01.364. The project does not involve PSD permitting requirements.

HE/hp      Permit No. T1-040122

## **APPENDIX**

**Dynamic Fabricators, LLC  
Rathdrum**

**T1-040122**

**AIRS Data Entry Form**



## AIRS/AFS<sup>A</sup> FACILITY-WIDE CLASSIFICATION<sup>B</sup> DATA ENTRY FORM

Facility Name: Dynamic Fabricators, LLC

Facility Location: Rathdrum

AIRS Number: 055-00035

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO <sub>2</sub>	B							U
NO <sub>x</sub>	B							U
CO	B							U
PM <sub>10</sub>	B							U
PT (Particulate)	B							
VOC	B							U
THAP (Total HAPs)	A						A	
APPLICABLE SUBPART								
WWW								

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, **or** each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).